

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

----- x  
In re: : Chapter 15  
: Case No. 24-10438 (LSS)  
GOLI NUTRITION INC., *et al.*,<sup>1</sup> : Jointly Administered  
Debtors in a Foreign Proceeding. :  
----- x

**NOTICE OF FILING OF (I) PROPOSED APPROVAL AND REVERSE VESTING  
ORDER, AND (II) PROPOSED LIQUIDATION ORDER**

**PLEASE TAKE NOTICE** that on March 19, 2024, Deloitte Restructuring Inc., in its capacity as the court-appointed monitor and duly authorized foreign representative (in such capacity, the “Petitioner”), as defined by section 101(24) of title 11 of the United States Code (the “Bankruptcy Code”), of Goli Nutrition Inc., a company incorporated in Québec, Canada (“Goli Canada”) and Goli Nutrition Inc., a company incorporated in Delaware (together with Goli Canada, the “Debtors”) filed the above-captioned chapter 15 cases of the Debtors in the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).

**PLEASE TAKE FURTHER NOTICE** that on March 19, 2024, Petitioner filed *Petitioner’s Motion for Entry of an Order (I) Recognizing and Enforcing the RVO and the Atos Sale Order, (II) Approving the Sale Transactions Free and Clear of Liens, Claims, and Encumbrances, and (III) Granting Related Relief* [D.I. 7 (under seal) and 8 (redacted)] (the “Sale Motion”), which attached a proposed form of order as Exhibit A (the “Proposed Order”) thereto.

**PLEASE TAKE FURTHER NOTICE** that the Petitioner hereby files a copy of the proposed *Approval and Reverse Vesting Order* to be entered by the Superior Court, sitting in the Commercial Division for the district of Montréal (the “Canadian Court”), attached hereto as Exhibit A, which is Exhibit 1 to the Proposed Order.

**PLEASE TAKE FURTHER NOTICE** that the Petitioner hereby files a copy of the proposed *Liquidation Order* to be entered by the Canadian Court, attached hereto as Exhibit B, which is Exhibit 2 to the Proposed Order.

**PLEASE TAKE FURTHER NOTICE** that, in accordance with *Order Specifying the Form and Manner of Service of Notice*, the Bankruptcy Court has scheduled a hearing to consider the *Petitioner’s Motion for Entry of an Order (I) Recognizing and Enforcing the RVO and the Atos Sale Order, (II) Approving the Sale Transactions Free and Clear of Liens, Claims, and Encumbrances, and (III) Granting Related Relief* [D.I. 7] for **April 15, 2024 at 12:00 p.m.**

<sup>1</sup> The Debtors in these Chapter 15 cases, are: Goli Nutrition, Inc., a company incorporated in Québec, Canada and the last 4 digits of its Canadian business number is 0002; and Goli Nutrition Inc., a company incorporated in Delaware and the last 4 digits of its federal tax identification number is 2655. The Debtors are collectively managed from their corporate headquarters which are located at 2205 Boul. De la Côte-Vertu, suite 200, Montreal, Québec, Canada.

(ET) before the Honorable Laurie Selber Silverstein, at the Bankruptcy Court, 824 N. Market Street, 6th Floor, Courtroom No. 2, Wilmington, Delaware 19801. Only those objections made in writing and timely filed in accordance with the below procedures will be considered by the Bankruptcy Court at such hearing.

Dated: April 1, 2024  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

*/s/ Matthew R. Pierce*

---

Matthew B. McGuire (No. 4366)  
Matthew R. Pierce (No. 5946)  
Joshua B. Brooks (No. 6765)  
919 Market Street, Suite 1800  
Wilmington, Delaware 19801  
Telephone: (302) 467-4400  
Facsimile: (302) 467-4450  
Email: mcguire@lrclaw.com  
pierce@lrclaw.com  
brooks@lrclaw.com

-and-

**NORTON ROSE FULBRIGHT US LLP**

Andrew Rosenblatt (admitted *pro hac vice*)  
Francisco Vazquez (admitted *pro hac vice*)  
Michael Berthiaume (admitted *pro hac vice*)  
1301 Avenue of the Americas  
New York, New York 10019  
Telephone: (212) 408-5100  
Facsimile: (212) 541-5369  
Email: andrew.rosenblatt@nortonrosefulbright.com  
francisco.vazquez@nortonrosefulbright.com  
michael.berthiaume@nortonrosefulbright.com

*Counsel to the Petitioner*